

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

LATERRYL SADDLER,)	Case No. 4:18-cv-00192
Plaintiff,)	
vs.)	
PNC BANK,)	
Defendant.)	

**2ND AMENDED PLAINTIFF'S ANSWERS TO DEFENDANT PNC BANK, N.A.'S
COUNTERCLAIM
ANSWER TO ALLEGATIONS COMMON TO ALL COUNTS**

Comes now Plaintiff and for her answer states as follows:

- 1) Plaintiff lacks sufficient knowledge, and therefore denies.
- 2) Plaintiff admits Paragraph 2.
- 3) Plaintiff's/Counterclaim Defendant denies that Saddler Residential Care Facility's principal place of business is St. Louis County, but admits the rest and remainder of Paragraph 3.
- 4) Plaintiff admits Paragraph 4.
- 5) Plaintiff admits Paragraph 5.
- 6) Plaintiff admits Paragraph 6.
- 7) Plaintiff lacks sufficient knowledge, and therefore denies.
- 8) Plaintiff lacks sufficient knowledge, and therefore denies.
- 9) Plaintiff lacks sufficient knowledge, and therefore denies.
- 10) Plaintiff lacks sufficient knowledge, and therefore denies.
- 11) Plaintiff lacks sufficient knowledge, and therefore denies.

12) Plaintiff lacks sufficient knowledge, and therefore denies.

13) Plaintiff lacks sufficient knowledge, and therefore denies.

14) Plaintiff lacks sufficient knowledge, and therefore denies.

15) Plaintiff lacks sufficient knowledge, and therefore denies.

16) Plaintiff lacks sufficient knowledge, and therefore denies.

17) Plaintiff denies Paragraph 17.

18) Plaintiff denies Paragraph 18.

COUNT I
BREACH OF NOTE

19) Plaintiff's/Counterclaim Defendants restate and incorporate by reference each and every answer contained in paragraphs 1 – 18 as if full set forth herein.

20) Plaintiff denies Paragraph 20.

21) Plaintiff denies Paragraph 21.

22) Plaintiff denies Paragraph 22.

23) Plaintiff lacks sufficient knowledge, and therefore denies.

24) Plaintiff lacks sufficient knowledge, and therefore denies.

25) Plaintiff lacks sufficient knowledge, and therefore denies.

26) Plaintiff admits Paragraph 26.

27) Plaintiff denies Paragraph 27.

28) Plaintiff denies Paragraph 28.

WHEREFORE, Plaintiff prays dismissal.

COUNT II
BREACH OF GUARANTY

29) Plaintiff's/Counterclaim Defendants restate and incorporate by reference each and every answer contained in paragraphs 1 – 28 as if full set forth herein.

- 30) Plaintiff denies Paragraph 30.
- 31) Plaintiff denies Paragraph 31.
- 32) Plaintiff lacks sufficient knowledge, and therefore denies.
- 33) Plaintiff denies Paragraph 33.
- 34) Plaintiff denies Paragraph 34.
- 35) Plaintiff denies Paragraph 35.
- 36) Plaintiff denies Paragraph 36.
- 37) Plaintiff denies Paragraph 37.
- 38) Plaintiff denies Paragraph 38.

WHEREFORE, Plaintiff prays dismissal.

COUNT III
PETITION FOR APPOINTMENT OF RECEIVER

- 39) Plaintiff's/Counterclaim Defendants restate and incorporate by reference each and every answer contained in paragraphs 1 – 38 as if full set forth herein.
- 40) Plaintiff lacks sufficient knowledge, and therefore denies.
- 41) Plaintiff denies Paragraph 41.
- 42) Plaintiff denies Paragraph 42.
- 43) Plaintiff lacks sufficient knowledge, and therefore denies.
- 44) Plaintiff denies Paragraph 44.
- 45) Plaintiff denies Paragraph 45.
- 46) Plaintiff denies Paragraph 46.
- 47) Plaintiff denies Paragraph 47.
- 48) Plaintiff denies Paragraph 48.

49) Plaintiff admits Paragraph 49.

52) Plaintiff denies Paragraph 52.

53) Plaintiff denies Paragraph 53.

54) Plaintiff denies Paragraph 54.

55) Plaintiff denies Paragraph 55.

56) Plaintiff denies Paragraph 56.

57) Plaintiff denies Paragraph 57.

58) Plaintiff denies Paragraph 58.

WHEREFORE, Plaintiff requests dismissal at Defendant's Cost.

Respectfully submitted:

/s/ Charles E. Kirksey, Jr.
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CERTIFICATE OF SERVICE: The undersigned hereby certifies that on this 29th day of May, 2018, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system, to be served by operation of the court's electronic filing system upon all counsel of record.